

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION
SERVICE STANDARD CHANGES, 2012

DOCKET NO. N2012-1

INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES POSTAL
SERVICE [DBP/USPS-17 through 29]

David B. Popkin hereby requests the United States Postal Service to answer, fully and completely, the following interrogatories pursuant to the Commission's Rules of Practice and Procedure. Any reference to testimony or other sources should indicate the page and line numbers. The instructions contained in the interrogatories DFC/USPS-T1-1-6 in Docket MC2006-7 dated February 23, 2007, are incorporated herein by reference. I am available for informal discussion to respond to your request to "clarify questions and to identify portions of discovery requests considered overbroad or burdensome."

December 28, 2011

Respectfully submitted,

N20121C17

DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528

DBP/USPS-17 Please refer to your response to Interrogatory DBP/USPS-3. Please explain in generalities how overnight First-Class Mail which nominally has a travel time of 3 or less hours will now have a 3-day standard which nominally will have a travel time of over 4 hours.

DBP/USPS-18 Please refer to your response to Interrogatory DBP/USPS-4 subpart [b]. Please provide a specific page and line number of USPS Library Reference N2012-1/7 that provides the response to my Interrogatory.

DBP/USPS-19 Please refer to your response to Interrogatory DBP/USPS-5. Please provide a specific page and line number of USPS Library References N2012-1/7 and 2012-1/8 that provides the response to my Interrogatory.

DBP/USPS-20 Please refer to your response to Interrogatory DBP/USPS-7 subpart [a]. Please provide a specific document in Docket PI2008-1 and page and line number that provides the response to my Interrogatory.

DBP/USPS-21 Please refer to your response to Interrogatory DBP/USPS-7. Please provide a copy of the current EXFC Contract and Statement of Work.

DBP/USPS-22 Please refer to your response to Interrogatory DBP/USPS-7 subparts [b] and [c]. The evaluation of the performance of First-Class Mail with respect to achieving the new service standards being proposed in this Docket is relevant. Please respond to Interrogatory DBP/USPS-7 subparts [b] and [c].

DBP/USPS-23 Please refer to your response to Interrogatory DBP/USPS-10 and the associated USPS Library Reference N2012-1/39. The original Interrogatory requested data for City Delivery offices only. Please provide a response which is limited to only City Delivery offices and their classified stations and branches. The spreadsheet does not appear to list lobby collection times as requested.

Please provide a single spreadsheet with the final collection time and the final dispatch time on the same horizontal line so that compliance with the maximum time of one hour between the two times may be evaluated.

Since you have the Saturday data in the listing, please provide that in the new response.

The waiver reference in subpart [5] of the original Interrogatory refers to the authority contained in POM Section 322.22b.

Please provide a new Library Reference which will have a separate Workbook for each Area and will have a single spreadsheet [sorted by area and district] with the following column headings:

1. Area Name
2. District Name
3. Facility Name
4. Facility Subtype
5. State
6. ZIP Code
7. Day Name Listed as Weekday or Saturday – only show Monday through Friday if it is not the same for all five days
8. Final Lobby Collection Time if earlier than 5 PM
9. Final collection time at the blue box in front of the facility if earlier than 5 pm
10. Final Dispatch Time from the facility
11. Waiver granted Shown as Y or N

DBP/USPS-24 Please refer to your response to Interrogatory DBP/USPS-11.

[a] Please advise the specific part of the response to Interrogatory DBP/USPS-30 in Docket N2010-1 that responds to Interrogatory DBP/USPS-11 in this Docket.

[b] Please provide the number of facilities that have City Delivery Service.

[c] Please provide the number of facilities that have Rural Delivery Service.

[d] Please provide the number of facilities that have Contract Delivery Service.

Note: A given facility may appear in more than one listing.

[e] Approximately what percentage of facilities that have City Delivery Service will have carriers that have mail of various types being collected along their delivery routes that will return to their office too late for all that mail to be dispatched to the processing center on the same day that the mail is collected from the customer on weekdays?

[f] Approximately what percentage of facilities that have City Delivery Service will have carriers that have mail of various types being collected along their delivery routes that will return to their office too late for all that mail to be dispatched to the processing center on the same day that the mail is collected from the customer on Saturdays?

[g] Approximately what percentage of facilities that have Rural Delivery Service will have carriers that have mail of various types being collected along their delivery routes

that will return to their office too late for all that mail to be dispatched to the processing center on the same day that the mail is collected from the customer on weekdays?

[h] Approximately what percentage of facilities that have Rural Delivery Service will have carriers that have mail of various types being collected along their delivery routes that will return to their office too late for all that mail to be dispatched to the processing center on the same day that the mail is collected from the customer on Saturdays?

[i] Approximately what percentage of facilities that have Contract Delivery Service will have carriers that have mail of various types being collected along their delivery routes that will return to their office too late for all that mail to be dispatched to the processing center on the same day that the mail is collected from the customer on weekdays?

[j] Approximately what percentage of facilities that have Contract Delivery Service will have carriers that have mail of various types being collected along their delivery routes that will return to their office too late for all that mail to be dispatched to the processing center on the same day that the mail is collected from the customer on Saturdays?

DBP/USPS-25 Please refer to your response to Interrogatory DBP/USPS-13. Please explain in generalities how 3-day First-Class Mail which nominally has a travel time of more than 12 hours will now have a 2-day standard which nominally will have a travel time of 4 or less hours.

DBP/USPS-26 [a] For every given service standard for First-Class Mail between ZIP Code pairs in the A to B direction, will it also have the same service standard in the B to A direction?

[b] If not, please provide the exceptions either individually or generically as might apply in a non-contiguous US 3-digit ZIP Code area.

DBP/USPS-27 Several years ago the Postal Service provided customers with a CD Rom showing the service standards for various mail categories. This CD provided

various maps with different color overlays. Are there any plans to resume distribution of these and if so, when and if not, why not?

DBP/USPS-28 In Docket N2006-1, USPS Witness David E. Williams testified to the following on July 18, 2006, on Page 546 line 23 to Page 547 line 22

Because we've got excess capacity in our facilities, because we've introduced technology in the form of optical character readers and very very high speed automation, because we have the equipment that provides us much greater depth of sort in our distribution operations, all those technology changes have decreased the cycle time, that is that time that it takes to process mail. We process mail much much faster to greater depths of sort in our facilities, and you couple that with the very significant decreases in single piece first class mail, the fact that we've got tremendous excess capacity in our originating operations because our mailers are dropping deeper and deeper into our system. It's that operating window that has traditionally been full of mail with much slower equipment. All those factors combined have created a great opportunity to have mail come in later and still allow us to get greater depth of sort much quicker and to be able to meet the operating plan of that facility. It doesn't mean that we've got to change collection box changes. We're leveraging technology, taking advantage of the excess capacity to process this mail within the boundaries of the operating plans.

[a] Would this testimony still be valid as of today under the current existing conditions?

[b] Would this testimony still be valid after the implementation of the proposed Docket?

[c] If your response to subparts [a] and [b] above is not an unequivocal yes, please explain why it would no longer be valid.

DBP/USPS-29 Please refer to your response to Interrogatory DBP/USPS-16. At this point in time have any changes in Part 3 of the Postal Operations Manual been considered or discussed as a result of the potential implementation of the proposed Docket?